

VIA ECF

August 21, 2025

Hon. Ona T. Wang
Southern District of New York

RE: *In re OpenAI Copyright Litigation*, 25-md-3143 (SHS) (OTW)

Dear Magistrate Judge Wang:

In June, the Plaintiffs and OpenAI Defendants in the above-referenced MDL filed a letter advising that the parties had agreed upon a Training Data Inspection Protocol (the “Protocol”). Dkt. No. 101. The June Protocol included placeholders to indicate where information cross-referencing the Stipulated Protective Order would be inserted upon its entry. *See* Dkt. No. 101-1 at ¶¶ 5, 7(i). Now that the Court has entered the Stipulated Protective Order, the parties respectfully submit a finalized Protocol. The only changes are in paragraphs 5 and 7(i), where the parties have inserted cross references to the Protective Order.

August 21, 2025

Respectfully submitted,

/s/ Justin Nelson
Justin Nelson
Susman Godfrey L.L.P.
On behalf of Class Plaintiffs

/s/ Jennifer Maisel
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On behalf of News Plaintiffs

/s/ Thomas Gorman
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